



PLANNING, DESIGN AND ACCESS STATEMENT
PROPOSED RESIDENTIAL DEVELOPMENT AND HIGHWAY
IMPROVEMENTS AT LAND NORTH OF PARC Y DELYN,
CARMARTHEN

On behalf of
Omnicorp Ltd

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1.0 INTRODUCTION

1.1 Evans Banks Planning has been instructed by Omnicorp Ltd (the Applicants) to prepare this Planning, Design and Access Statement to accompany an outline planning application for residential development and associated highway improvements at land north of Parc y Delyn, Carmarthen. This current application represents a revised scheme to that submitted as part of planning application PL/06114, which was refused by the Local Planning Authority (LPA) on 13th December 2023. This current submission has therefore given due consideration to the reasons given for the previous decision and directly addressed each point of concern raised.

1.2 This Statement therefore forms part of the submissions of the application to be considered by the Authority, and in compliance with the requirements of TAN12 provides information on the following points:

- A brief description of the site and surrounding area
- A description of the proposed development
- Consideration of relevant local planning policy
- Accessibility
- Character
- Community Safety
- Environmental Sustainability
- Movement to, from and within the development

2.0 SITE DESCRIPTION

2.1 THE SITE

- 2.1.1 The application site predominantly relates to part of an undeveloped parcel of land, located just north of Parc y Delyn, Carmarthen. The enclosure is dominated by semi-improved grassland (see photograph below) with large areas of scrub and slopes downwards in a north to south direction:



Photograph 1

- 2.1.2 The boundaries of the application site are well defined by a mix of hedgerows, trees and stock proof fencing. Further trees of varying states of health can be found throughout a number of areas of the application site, as detailed in the accompanying updated Tree Survey Report.
- 2.1.3 The remaining elements of the application site then relate to small strips of land (all in the control of the Applicant) along the eastern edge of Penlan Road, which will be utilised as part of the proposed scheme to widen the exiting carriageway and improve pedestrian linkages.

- 2.1.4 Pedestrian access to the application site is at present via Parc y Delyn through informal vegetation. The access is identified by the red arrow on the aerial image below:



Photograph 2

- 2.1.5 Although this is the existing access to the site, a new vehicular and pedestrian access is proposed as part of this development along Penlan Road.

2.2 THE SURROUNDING AREA

- 2.2.1 In the immediate sense, the land to the north of the site currently forms part of a wider enclosure that includes the application site. The land to the south and west is then dominated by existing residential development, forming part of the greater urban area of Carmarthen.
- 2.2.2 As detailed above, the application site forms part of the greater urban area of Carmarthen with its associated community facilities and local services. The application site is within walking distance from the town centre. Therefore, the application site is clearly in a very sustainable location that can promote non-car modes of transport.

2.3 PROJECT DESIGN PARAMETERS AND PRINCIPLE

2.3.1 As a result of the above, the following design principles and parameters have influenced the design subject of this planning application:

- **Density** – Although in outline format only at this stage, the proposal represents a balance between making efficient and effective use of a greenfield site, whilst being respectful and sympathetic to its transitional location between open countryside and the existing urban form.
- **Layout** – The proposal has been steered by existing adjoining development and land uses, together then by the site's original topography, landscape and ecological assets.
- **Scale** – The proposal is for two-storey units to meet an identified market demand and be responsive to the site's topographical attributes.
- **Biodiversity** – The proposal will provide a secured habitat for a low population of reptiles found in the area, providing opportunity for this to grow in the future. In addition, provision for additional tree and hedgerow planting will be available both on and beyond the application site on land owned by the Applicant, should the local planning authority consider this to be necessary.

3.0 THE PROPOSED DEVELOPMENT

- 3.1 The proposal is for the construction of residential dwellings with associated highway improvements. The following information therefore provides an overview of the scheme at this outline stage and should be read in conjunction with the accompanying supporting documentation and drawings.

General Siting

- 3.2 The general layout of the site has been steered by a number of on-site and off-site factors. Its point of access will be via its western boundary, via Penlan Road where a new estate road is proposed, which follows that of a previously approved scheme for the site:



Plan A

- 3.3 Although in outline format at this stage, it is envisaged that the general layout of the site will consist of a mix of 20 detached dwellinghouses, based on a density comparable with that of the existing urban area to the south. These new units will then be positioned around a principle new adoptable estate road with each dwelling gaining access either directly off this or via short private shared drives. Each unit will then be served by generous private rear gardens, with smaller grass forecourts to

their front. New rear boundaries serving each unit will then be defined by fencing or hedgerows.

- 3.4 In addition to the above off-site improvements to the existing adjoining public highway (Penlan Road), as set out in the accompanying Transport Statement, would also be delivered as part of the application development. This will include localised road widening and new footways to improve access and pedestrian linkage to the application site.

Scale

- 3.5 The proposal is for in the region of 20 two storey dwellings and associated highway works, with the potential mix and scale parameters of these units indicated on the accompanying drawings.

- 3.6 All properties will be served by off-street parking in-line with the Authority's standards.

External Finishes

- 3.7 Although in outline format, it is anticipated that the external finishes of the development will draw from the existing palette of the local area.

Drainage

- 3.8 All foul water will be disposed of via a new connection to the existing public sewer network in the manner indicated in the accompanying Drainage Strategy drawing.
- 3.9 As outlined in the accompanying Drainage Strategy drawing, surface water will be captured and dealt with in line with current surface water regulations, In summary, this will consist of a mix of measures, as illustrated on the accompanying documentation.

Parking

- 3.10 Each of the proposed dwellings will be served by the required level of parking spaces with visitor parking accommodated in an on-street form, in line with local highway authority standards.

Affordable Housing

- 3.11 In line with local planning policy requirements, it is proposed that up to 6 of the proposed units will be affordable in nature, with the specific units to be identified at the reserved matters stage.

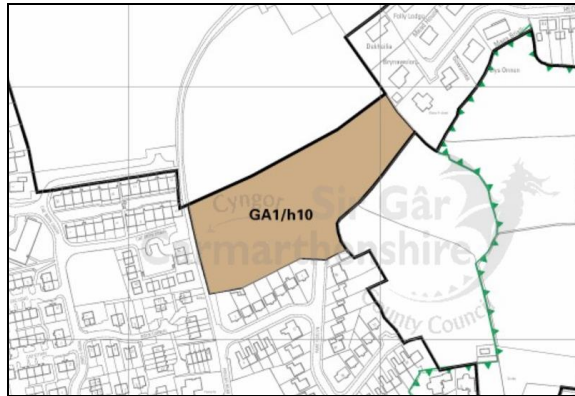
4.0 PLANNING POLICY

4.1 LOCAL PLANNING POLICY

4.1.1 In terms of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the adopted development plan for the area within which the application site lies is the *Carmarthenshire Local Development Plan (LDP)*. It is therefore the policies of this document that have been referred to in the preparation of the proposal subject of the planning application in question, including the following:

- SP1 Sustainable Places and Spaces
- GP1 Sustainability and High Quality Design
- GP2 Development Limits
- H1 Housing Allocations
- AH1 Affordable Housing
- EQ4 – Biodiversity
- EQ5 – Corridors, Networks and Features of Distinctiveness
- TR3 Highways in Developments – Design Considerations

4.1.2 In terms of the principle of residential development at the location in question, Plan B provides an illustration of the LDP Proposals Map for the application site and adjoining area.



Plan B

- 4.1.3 As can be seen, the site lies within the defined Development Limits or Carmarthen and is also allocated for residential development under the provisions of Policy H1 for up to 35 units, subject to on-site factors such as topography and biodiversity assets. With the principle of the proposal therefore supported by Policy SP1, Policy GP2 and Policy H1, the more detailed policy related requirements are now considered.

Policy GP1 – Sustainability and High Quality Design

- 4.1.4 Policy GP1 (*Sustainability and High Quality Design*) provides the overarching framework for high quality design in development, conservation and enhancement proposals within Carmarthenshire County Council. For development proposals to be permitted they must accord, where relevant, to 14 Criteria. Taking into account that the application proposal is in outline format only at this stage, it is considered that 7 are of relevance to the proposed development and an assessment of the application proposal against each now follows:
- 4.1.5 Criterion a) requires that developments conform and enhance with the character and appearance of the site, building or area. The proposed application has given full consideration to its setting in the immediate and wider sense with regard to the scale of the proposed development and its positioning within the existing settlement. Considering the above and the combination of the fact that the proposal has given full consideration of the topography of the site, it is considered that the proposal adheres

to the requirements of Criterion a) and b), as the Authority concluded in determining the aforementioned previous planning application.

- 4.1.6 Criterion d) then requires that the proposal does not have a significant impact on the amenity of adjacent land uses, properties, residents, or the community. The proposed parcel of undeveloped land – allocated for housing development - is of an appropriate size for its proposed use, particularly when its topography is taken into consideration. In addition, the accompanying layout for the proposal, highlights that sufficient separation can be achieved between existing and proposed units to ensure that all interests are protected. The proposal therefore continues to satisfy the requirements of Criterion d).
- 4.1.7 Criterion f) requires the retention of important local features such as trees and hedgerows, together with the use of good quality hard and soft landscaping. As mentioned above, a number of trees and hedgerows form the boundary of the site, which will be largely maintained. In addition, a number of smaller specimens within the site boundary will be utilised to create a new hedgerow feature along the northern boundary of the application site, as well as a buffer zone for ecological purposes.
- 4.1.8 Notwithstanding the above, a number of smaller specimens within the site will require removal in order to accommodate the proposed development, as envisaged by the adopted LDP. As a result, and in line with the new requirements brought about by Chapter 6 of *Planning Policy Wales (Edition 12)*, the final detailed scheme for the site will include provision for additional tree planting (to be agreed with the LPA) within the site, as well as further on land to the north on land also in the ownership of the Applicant, if required.
- 4.1.9 The above combined with the ecology mitigation measures set out in the accompanying reports being delivered as part of the proposal, ensures therefore that the requirements of Criterion f) will be fully supported and satisfied by the application proposal, as will in turn the requirements of Policy EQ4 and Policy EQ5.

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- 4.1.10 Criterion g) requires that proposed developments achieve and create attractive, safe places and public spaces which ensures security. This will be implemented within the detailed proposal.
- 4.1.11 Criterion h) states that an appropriate access/exit must be provided which does not give rise to any parking or highway safety concerns on the site or within the locality. The development proposes a new access route along Penlan Road to the western boundary of the site, as well as a number of alterations to the existing public highway to the benefit of all existing and proposed road users.
- 4.1.12 Since the determination of the aforementioned application, extensive discussions have been held with the Authority's Highway Officers, resulting in not only amendments to the scheme, but also further technical survey information and data being submitted as part of this application to demonstrate that the proposal will have no detrimental impact on the level of safety for users of the adjoining and surrounding highway network.
- 4.1.13 This current application submission therefore now fully addresses previous concerns raised by the local highway authority and so the requirements of Criterion h) are now considered to be satisfied.
- 4.1.14 Criterion j) states the need to ensure the provision for satisfactory generation, treatment, and disposal of both surface and foul water. These have been included within the drainage plans for the proposal.
- 4.1.15 In conclusion it is therefore considered that the proposed development complies with all relevant aspects of Policy GP1 (*Sustainability and High Quality Design*).

Policy AH1 - Affordable Housing

- 4.1.16 Policy AH1 (*Affordable Housing*) states that a contribution to affordable housing will be required on all housing allocations and windfall sites. The council will seek a level

of affordable housing contribution of 30% in higher viable areas, 20% in the middle viable areas and 10% within the sub-market areas.

- 4.1.17 The proposed application proposes 20 units and taking into account its geographical position, will therefore provide 6 of these on an affordable basis, with the specific position of each unit within the site to be determined as part of any future reserved matters application.

Policy TR3 – Highways in Developments – Design Considerations

- 4.1.18 Policy TR3 (*Highways in Developments – Design Considerations*) states that the design and layout of all development proposals will, where appropriate adhere to 6 elements of Criteria. In the determination of the previously proposed scheme, the Authority considered that insufficient improvements to the highway were included and so in turn in its view, the proposal failed to adhere to the relevant requirements of Policy TR3.
- 4.1.19 The revised scheme subject of this current application now includes highway improvements identical to those previously approved by the Authority, which are all deliverable due to the Applicant having control and ownership indirectly to each relevant element. In addition to this, this current application is accompanied by further technical survey data, providing assessment with regards to on-street parking levels and volumetric surveys, which again support the conclusion that no detriment to existing or proposed highway users will be incurred.
- 4.1.20 Combined therefore with the proposal being served by sufficient off-road parking provision and the site being at a sustainable location, the application proposal now satisfies all relevant criteria of Policy TR3.

5.0 ACCESSIBILITY

5.1 ACCESSIBILITY

- 5.1.1 All inclusive design issues identified have been addressed wholly in compliance with the requirements of the Disability Rights Commission Code of Practice “Rights of Access: Services and Premises”, DQR Design Standards and Guidance, as well as Part M of the Building Regulations, where applicable. Thereafter full compliance will be maintained in perpetuity.
- 5.1.2 The development proposal will ensure, wherever possible, that the maximum gradient of driveways and footways to building entrances will be as level as possible, but certainly no more than 1:20, and compliant with Part M of the Building Regulations. The development will be provided with non-slip pathways on each unit and laid to a minimum width of 1000mm.
- 5.1.3 The following measures will also be instigated as part of the detailed design of the proposed development:
- (a) Car parking spaces to all dwelling driveways will be surfaced firm and level, free from loose stones. Every effort will be made to ensure proposed parking facilities are well lit for all users.
 - (b) Hard and soft landscaping of garden and amenity areas will be wheelchair friendly and capable of access for all.
- 5.1.4 The proposals therefore ensure ease of access for all.

5.2 MOVEMENT TO, FROM AND WITHIN THE DEVELOPMENT

- 5.2.1 The application site is located at the edge of the urban area of Carmarthen with its associated community facilities and local services, many of which are located within walking distance of the site. The remainder then are easily accessible via one of the

number of regular bus services running in close proximity to the site, as well then as the wider range of community facilities and local services offered by the Town Centre.

- 5.2.2 As a result of the above and as established in previous proposals for the site, the application site will be able to promote the use of public transport and discourage the use of the private motor car.

6.0 CHARACTER

Landscape Design

- 6.1.1 The proposal is at this stage in outline format only and a detailed landscaping scheme will form part of any future reserved matters application.
- 6.1.2 Notwithstanding the above, as the accompanying details illustrate, the application proposal has sought to strike a balance between the two differing landscape settings adjoining its boundaries – open countryside and urban settlement. The proposal with its modest density and inclusion of green spaces within its developed and undeveloped elements has therefore facilitated a new residential development with a transitional role between these two differing landscape settings. This has been further secured through the retention of key boundary features at both the site's edges and within it.

Scale

- 6.1.3 The proposal will deliver 20 two storey dwellings with associated highway improvement works, whose scale parameters will be as set out on the accompanying drawings.

Number

- 6.1.4 The design objective is to provide a density and form that is representative of the site's transitional position discussed above, as well as respecting its topographical form. As a result, the proposal is for 20 dwellings.

Layout of Development

- 6.1.5 The layout of the proposed development has been steered by a number of factors including the site's topography, its physical attributes, ecological/arboricultural assets and proposed point of access. As a result, the proposal represents a logical layout that is sympathetic to both its immediate and wider setting, whilst also securing a high level of legibility for both residents of and visitors to the site.

Appearance

- 6.1.6 As detailed previously, the application is at this stage in outline format only. However, it is expected that the detailed design of the proposed units will draw on the existing architectural palette of the adjoining area.

7.0 COMMUNITY SAFETY

- 7.1 The layout of the proposed development is such that each new dwelling will promote and secure a sense of natural surveillance by virtue of their position in relation to the proposed development's means of access.

8.0 ENVIRONMENTAL SUSTAINABILITY

Landscaping/Townscape Setting

- 8.1 As detailed above, the sensitive design of each of the elements of the application proposal has ensured that the immediate and wider setting of the surrounding land uses are not harmed in any way.

Biodiversity and Local Environment

- 8.2 As detailed in the accompanying information, the proposal will have no detrimental impact on biodiversity or ecological interests of the area due to the proposed mitigation forming part of the application submissions. Whilst the proposal will include the removal of certain existing assets, these will be fully mitigated, enabling the site to deliver much needed housing as the policies of the current adopted LDP envisage the site to do so.

Energy Efficiency/Carbon Reduction

- 8.3 The following measures will be undertaken where possible to maximise energy efficiency and carbon reduction of the dwellings themselves and during their construction:

- Maximise use of daylight in key rooms through fenestration
- Use of local suppliers and labour wherever possible
- Use local recycled products wherever possible
- The dwellings will be insulated to current targets
- All fenestration will be insulated to current targets.
- Energy efficient internal and external lighting units will be installed.

Sustainable Materials

- 8.4 We understand that recycled or reclaimed products will be used in the construction of the proposal wherever possible

Water

- 8.5 We understand that a mains supply will be utilised. In line with this, we would propose that the domestic water and heating system of the dwellings be designed to reduce domestic water wastage, through a range of measures including low water consuming fittings in the bathroom and kitchen.

Waste Management

- 8.6 We understand that the dwellings have access to domestic recycling facilities.
- 8.7 We understand that a connection will be made to the public sewer for the disposal of foul waste.

9.0 CONCLUSION

- 9.1 The proposal is for the construction of 20 residential dwellings with associated highway improvements, where 6 will be allocated as affordable.
- 9.2 The application proposal represents a logical residential development on a site allocated for housing within the LDP. It is near to the town centre emphasising its sustainable location that will ensure that the proposed units are in close proximity to a range of community facilities and local services, reducing the need to travel by the private motor car.
- 9.3 This current application represents the latest in a series that continues to satisfactorily address all concerns and requests raised by various departments of the Authority. Through the submissions of this current application, it has clearly been demonstrated that the application proposal represents a truly sustainable form of development, having taking into consideration and struck a balance between economic, social and environmental considerations – giving no greater weight to one than another, as requested by national planning policy.
- 9.4 This current application therefore – despite its outline form - directly addresses the matters of trees, ecological attributes, access requirements and surface water disposal in a manner that also fully satisfies local planning policy. In conclusion therefore, the proposal represents an appropriate and sustainable affordable housing development that adheres to all relevant current planning policy and fully addresses all matters previously raised by the Authority.